

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

METAL RESOURCES INC.,	)	
	)	
Plaintiff,	)	Civil Action No. 08 C 1068
	)	
v.	)	
	)	
METALMAX, LLC	)	Judge Robert W. Gettleman
	)	
Defendant.	)	

**UNOPPOSED MOTION TO EXTEND TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendant Metalmax, LLC (“Metalmax”), by its counsel, respectfully requests an extension of time, to and including March 18, 2008, to answer or otherwise plead to the complaint. In support of this motion, Metalmax states:

1. On or about February 21, 2008, Metalmax removed this action to federal court. Because of the removal, Metalmax’s answer is due on February 26, 2008. Fed. R. Civ. P. 81(c).
2. Counsel for Metalmax, LLC needs additional time to complete her investigation and prepare a responsive pleading.
3. From February 27 to March 5, 2008, counsel for Metalmax will be out of the country for a previously scheduled family vacation. Therefore, Metalmax seeks a three week extension of time, to and including March 18, 2008, to answer or otherwise plead to the complaint.
4. On February 25, 2008, the undersigned conferred by telephone with counsel for Plaintiff and was advised that Plaintiff had no objection to the extension of time sought in this motion.

WHEREFORE, Metalmax respectfully requests that the Court enter an order granting an extension of time to and including March 18, 2008, for Metalmax to answer or otherwise plead to the complaint.

February 25, 2008

Respectfully submitted,

METALMAX, LLC

By: Ann H. Cisneros  
Ann H. Cisneros, Colo. Reg. No. 32547  
ANN H. CISNEROS LAW, LLC  
P.O. Box 7310  
Denver, Colorado 80207  
303-284-1501 (voice)  
303-496-1502 (fax)  
[acisneros@annhcisneroslaw.com](mailto:acisneros@annhcisneroslaw.com)

**Certificate of Service**

The undersigned certifies that a copy of the foregoing

**NOTICE OF MOTION**

and

**UNOPPOSED MOTION TO EXTEND TIME  
TO ANSWER OR OTHERWISE PLEAD**

was served on the following counsel for Plaintiff by U.S. mail, postage prepaid, on February 26, 2008.

Ronald J. Senechaile  
Pluymert, Piercey, MacDonald & Amato, LTD  
2300 Barrington Road, Suite 220  
Hoffman Estates, IL 60195

*s/Ann H. Cisneros*

Ann H. Cisneros